

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

NETFLIX, INC.,

*Movant,*

v.

FORTRESS INVESTMENT GROUP  
LLC,

*Respondent.*

CASE NO.

Related to No. 8:18-cv-02055-GW-DFM,  
pending in the United States District Court  
for the Central District of California,

**NOTICE OF MOTION TO COMPEL  
FORTRESS INVESTMENT GROUP LLC  
TO COMPLY WITH SUBPOENAS**

**PLEASE TAKE NOTICE** that upon the accompanying (i) Memorandum of Law and (ii) Declaration of Martin E. Gilmore, Esq., and the exhibits thereto, Movant Netflix Inc. (“Movant”) will move this Court at the United States District Court, 500 Pearl Street, New York, New York 10007, on a date and time to be determined by the Court, for an Order pursuant to Fed. R. Civ. P. 45, compelling third party Fortress Investment Group (“Fortress”) to comply with subpoenas issued by Movant in the matter *Uniloc 2017 LLC v. Netflix, Inc.*, 8:18-cv-02055-GW-DFM (pending in the United States District Court for the Central District of California) (hereinafter the “Litigation”), by producing documents and attending a deposition, without objection, by dates certain to be set by the Court, and for such other and further relief as the Court deems just and proper.

This Motion is supported by the accompanying Memorandum of Law, the Declaration of Martin E. Gilmore, Esq., dated July 16, 2020, with the exhibits thereto, the record in the Litigation, the facts of which the Court may take judicial notice, and any other papers submitted in support of the Motion.

**PLEASE TAKE FURTHER NOTICE** that, in accordance with Local Civil Rule 6.1(b) of this Court, Respondent’s opposition papers, if any, shall be served within fourteen days after service of the instant moving papers, and Movant’s reply papers, if any, shall be served within seven days after service of Respondent’s opposition papers.

Respectfully submitted,

/s/ Martin E. Gilmore

Martin E. Gilmore  
Perkins Coie LLP  
1155 Avenue of the Americas, 22nd Floor  
New York, NY 10036  
Telephone: 212.262.6900  
Facsimile: 212.977.1649  
MGilmore@perkinscoie.com

*Counsel for Movant  
Netflix, Inc.*

Dated: July 16, 2020

OF COUNSEL

Matthew C. Bernstein (*pro hac vice* pending)  
Perkins Coie LLP  
11452 El Camino Real, Suite 300  
San Diego, California 92130  
Telephone: 858.720.5700  
Facsimile: 858.720.5799

*Counsel for Movant  
Netflix, Inc.*